UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A "EDDY GRANT", GREENHEART MUSIC LIMITED, a United Kingdom Limited Company, and GREENHEART MUSIC LIMITED, an Antigua and Barbuda Limited Company,

Civil Action No. 1:20-cv-07103-JGK

Plaintiffs,

-against-

DONALD J. TRUMP and DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendants.

DEFENDANTS DONALD J. TRUMP AND DONALD J. TRUMP FOR PRESIDENT, INC.'S <u>MOTION TO DISMISS</u>

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Donald J. Trump and Donald J. Trump For President, Inc. (collectively "Defendants"), by and through their undersigned counsel, respectfully move the Court for an order dismissing the Complaint of Plaintiffs Edmond Grant p/k/a "Eddy Grant," Greenheart Music Limited, a United Kingdom Limited Company, and Greenheart Music Limited, an Antigua and Barbuda Limited Company, and for such other relief as the Court may deem just and appropriate.

Defendants' Memorandum of Law in Support of the Motion, supporting exhibits, and the Declaration of Darren W. Saunders, are all being filed contemporaneously and in support of this Motion.

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Respectfully submitted,

Dated: November 11, 2020 New York, New York

/s/ Darren W. Saunders

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